

**United States Environmental Protection Agency  
Region VI  
POLLUTION REPORT**

**Date:** Tuesday, September 19, 2006

**From:** Warren Zehner

**Subject:** (FPN E05656) Advance Industries LLC - A Robichaux  
Valentine Oil and Gas Field, 5.7 miles SW of Lockport, LA  
Latitude: 29.6011110  
Longitude: -90.4578880

<b>POLREP No.:</b>	3	<b>Site #:</b>	N/A
<b>Reporting Period:</b>		<b>D.O. #:</b>	N/A
<b>Start Date:</b>	1/4/2005	<b>Response Authority:</b>	OPA
<b>Mob Date:</b>		<b>Response Type:</b>	
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Assessment
<b>CERCLIS ID #:</b>	N/A	<b>Contract #</b>	
<b>RCRIS ID #:</b>		<b>Reimbursable Account #</b>	
<b>FPN#</b>	E05656		

### Site Description

#### Site Location

The Advance Industries LLC - A Robichaux abandoned oil production facility (EPA ID 29-E-1083) was referred to the United States Environmental Protection Agency (EPA) on December 1, 2004 by the State of Louisiana to be considered for Oil Pollution Act (OPA) response actions. This facility is located in Valentine Oil and Gas Field (Field ID: 9096), approximately 5.6 miles southeast of Lockport, in Section 004, Township 17 South, Range 20 East of Lafourche Parish, Louisiana. The facility is accessed from the south-southwest via an unnamed access road off of Louisiana Highway (LA Hwy) 308.

#### Site Description

The facility consists of three above ground storage tanks (AST), one heater treater (HT), one separator (S), and one production well located at one distinct potential spill source (Source 1). Two bolted-steel tanks, identified as AST1 and AST2, and one welded-steel tank, identified as AST3, are located in 100-foot by 35-foot earthen secondary containment area identified as CONT1. One welded-steel heater treater, identified as HT1, and one welded-steel separator, identified as S2, are located 100 feet north-northeast of CONT1. A second welded-steel separator, identified as S1, is located 220 feet north-northeast of CONT1, next to the production wells.

The facility serviced two production wells, the A Robichaux Well No. 001 (SN 130555) and the A Robichaux Well No. 001D (SN 131461), which are dually completed within the same bore hole. Louisiana Department of Natural Resources (LDNR) records lists these wells as orphaned. LDNR records indicate the production and storage components were associated with SN 130555.

#### Previous Actions

The EPA Region 6 Federal On-Scene Coordinator (FOSC) conducted a reconnaissance of the facility on June 28, 2005 to determine if a failure of the storage and process components through corrosion, vandalism or force majeure has a high potential to release a harmful quantity of oil, within the meaning of Section 311 (b)(3) of the Clean Water Act (CWA), 33 United States Code (U.S.C.) § 1321(b)(3), and 40 Code of Federal Regulations (CFR) § 110.3(b), into the waters of the United States. The EPA Region 6 FOSC has determined from his reconnaissance that Source 1 of this facility meets the revised Region 6 substantial threat criteria.

### **Current Activities**

On November 29, 2005, the Site Assessment (SA) was conducted by the United States Army Corps of Engineers (USACE) and their contractor, on behalf of the EPA, to document the condition of the abandoned facility. Access to conduct on-site activities was coordinated with LDNR Conservation Enforcement Specialist (CES), Keith Adams.

AST1, AST2, AST3 and S2 were gauged and their conditions were documented. HT1 and S1 could not be accessed for gauging. The volume of their contents was estimated via acoustic and thermal differentials, and their conditions were documented. The condition of all containers was deemed to be inadequate, primarily due to rust, corrosion, and delaminated metal, predominantly around the bases of the containers or on the flanges, valves, or connecting flow lines. During the assessment, AST2, AST3 and HT1 were actively discharging their oily contents through seeps in the delaminated metal or valves at their bases.

The surface condition of CONT1 was documented. The local elevations were surveyed to determine the capacity of each containment area and the slope to the nearest drainage.

CONT1 and the area between CONT1 and the SN 130555/SN 131461 wellhead was heavily overgrown. Oil-stained soil covered a 6-foot by 10-foot area east of AST2 and a 4-foot by 4-foot area east of AST3 within CONT1. Additional oil-impacted areas may be obscured by the heavy vegetation. Breaches were present in the north, south and west berms of CONT1. The breaches in CONT1 significantly reduced containment capacity and allowed CONT1 contents to drain through drainage ditches to adjacent waterways.

The wellhead for the SN 130555/SN 131461 was located and documented. The well was corroded and covered with vegetation. A stair and platform were located next to the well. A flare stack was also noted between CONT1 and HT1.

### **Determination of Threat**

Drainage from the facility flows down gradient (a 5-foot drop over 490 feet) to a National Hydrography Dataset (NHD) defined unnamed tributary of Bayou Lafourche that is hydrologically connected to and forms a significant surface water nexus with Bayou Lafourche. Bayou Lafourche is navigable "in fact" and subject to interstate commerce (See. Site Drainage Map attached at the website for this facility).

Based on the Site Assessment (SA) data, there are approximately 501.7 bbl of oil, oil emulsion, and oily produced water that meet the definition of "oil" as defined by Section 1001(23) of OPA, 33 U.S.C. § 2701(23).

A substantial threat of discharge was determined to exist by the FOSC at this facility. During the assessment, AST2, AST3 and HT1 were actively discharging their oily contents to the

environment. All containers at Source 1 have heavy corrosion at the lower tank sidewall or on connecting flow lines and, due to their deteriorated conditions, catastrophic failure is imminent; meaning all tank contents will be released into secondary containment, if present. HT1, S1 and S2 have no secondary containment. The secondary containment berm surrounding AST1 through AST3 is breached, reducing its holding capacity to where 176 bbl of oil and oil emulsion would flow down gradient and ultimately impact Bayou Lafourche if action is not taken to mitigate this threat.

The FOSC has determined that a failure of the storage and process components through corrosion, vandalism or force majeure has a high potential to release a harmful quantity of oil, within the meaning of Section 311 (b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), and 40 CFR § 110.3(b), into the site drainage and ultimately into Bayou Lafourche.

### **Next Steps**

The SA and Enforcement Summary reports contain legally defensible field data that objectively quantifies and verifies the findings of substantial threat by the FOSC, and the enforcement/administrative support necessary to build the administrative record and a cost recovery case for the site. These actions are consistent with the criteria found in the U.S.C.G. National Pollution Fund Center (NPFC) Users Guide, July 2002.

POLREP No. 4 will advise of any potential responsible party (PRP) response or actions in response to the Notice of Federal Interest (NOFI), and EPA FOSC intentions for this abandoned facility.

If necessary, a Removal Project Plan (RPP) will be submitted to detail the planned corrective actions to address the substantial threat of discharge of oil to the navigable waters of the United States, as defined in Section 311(a)(2) of Federal Waters Pollution Control Act (FWPCA), U.S.C. § 1321, 40 CFR Part 110.1 and Section 1001(7) of OPA, 33 U.S.C. § 2701(7), and 33 CFR 154.120, that is posed by this facility, as determined by the standard EPA threat analysis protocols, which are consistent with the criteria for determination of a substantial threat of discharge found in the U.S.C.G. NPFC Users Guide, July 2002.

### **Key Issues**

#### **Enforcement**

The last Operator of Record/ PRP has been identified through the file maintained by the LDNR, Office of Conservation as: Advance Industries, LLC (Operator Code A120). The wells identified in the assessment report as being associated with this facility, specifically the A Robichaux Well No. 001 (SN 130555) and A Robichaux Well No. 001D (SN 131461), were reported by LDNR as last operated by this operator. All previous enforcement efforts by LDNR have produced no timely or technically appropriate responsible party actions, as evident by the current conditions at the facility.

A deed and title search was conducted to identify any other PRPs. All identified PRPs will be sent a NOFI.

The EPA FOSC will formally offer the PRPs the opportunity to conduct the necessary mitigation actions to abate any potential sources of release at the site through issuance of a NOFI. If the PRP declines to participate or fails to initiate a timely respond to notice, EPA plans to proceed with an Oil Spill Liability Trust Fund (OSLTF) financed cleanup action. The NOFI will clearly advise the PRP they may be subsequently held liable for the cost of government funded cleanup actions.

[www.epaosc.org/FPNE05656](http://www.epaosc.org/FPNE05656)